

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHEENA GRICE,  
Plaintiff

v.

C.A. No.: 1:17-cv-10944-WGY

VIM HOLDINGS GROUP, LLC, MICHAEL  
D'AMBROSE, HIRSCH MOHINDRA, B  
FINANCIAL, LLC, JOHN BARTLETT, U  
SOLUTIONS GROUP, LLC, THERESA  
D'AMBROSE, GLOBAL SERVICE GROUP, LLC,  
RUTH POUTANEN, KRW ATTORNEYS &  
ASSOCIATES, LLC, and GEORGE WAHBEH  
Defendants

**DEFENDANTS' JOINT MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

NOW COME the Defendants VIM Holdings Group LLC, Michael D'Ambrose, John Bartlett, Theresa D'Ambrose, Global Service Group LLC, Ruth Poutanen, KRW Attorneys and Associates, LLC, and George Wahbeh, by and through their respective attorneys, and pursuant to Federal Rule of Civil Procedure 12(b)(2) hereby move to dismiss the *Complaint and Jury Demand*.

For the reasons set forth in the accompanying *Memorandum of Law* this Court lacks personal jurisdiction over these defendants.

WHEREFORE, the Defendants respectfully pray and request that this Honorable Court DISMISS the Plaintiff's Complaint, award costs and fees, and enter such further relief deemed just and appropriate.

Respectfully Submitted,

The Defendants  
VIM Holdings Group LLC, Michael  
D'Ambrose, B Financial LLC, John  
Bartlett, U Solutions Group LLC, Theresa  
D'Ambrose, Global Service Group LLC,  
Ruth Poutanen,  
By their attorneys:

Dated: October 10, 2017

/s/ Mark Rossi  
Mark C. Rossi, Esq. (BBO: 662376)  
Bostonian Legal Group, LLC  
One Boston Place, 26<sup>th</sup> Floor  
Boston, Massachusetts 02108  
617-956-0956 (telephone)  
877-266-0957 (facsimile)  
[MCR@BostonianLegal.com](mailto:MCR@BostonianLegal.com)

The Defendant KRW Attorneys and  
Associates, LLC, and George Wahbeh  
By their attorneys,

Dated: October 10, 2017

/s/ Susan E. Cohen  
Susan E. Cohen, BBO # 553353  
Steven E. DiCairano, BBO # 694228  
PEABODY & ARNOLD LLP  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, MA 02210-2261  
Telephone: (617) 951-2100  
[scohen@peabodyarnold.com](mailto:scohen@peabodyarnold.com)  
[sdicairano@peabodyarnold.com](mailto:sdicairano@peabodyarnold.com)

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that on July 13, 2017, prior counsel for the Defendants, Benjamin R. Davis, conferred with the plaintiff's counsel, who did not assent to the relief sought in this motion. This motion is being re-filed by successor counsel and said undersigned counsel directs the Court's attention to the original Motion of July 14, 2017 (Docket # 21), which contains Attorney Davis' certification as well.

Dated: 10/10/ 2017

/s/ Mark C. Rossi  
Mark C. Rossi, Esquire

**CERTIFICATE OF SERVICE**

I, the undersigned counsel on behalf of all parties filing here, hereby certify that on the 10<sup>th</sup> day of October, 2017, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be mailed to those indicated as non- registered participants.

Dated: 10/10/ 2017

/s/ Mark C. Rossi

Mark C. Rossi, Esquire